

raiser&kenniff
ATTORNEYS AT LAW

Steven M. Raiser, Esq.
Thomas A. Kenniff, Esq.
Anthony J. Colleluori, Esq.
E. Gordon Haesloop, Esq.
Bruce R. Connolly, Esq.
John F. Campbell, III, Esq.
Ethan D. Irwin, Esq.
Valerie K. Mitchell, Esq.

300 Old Country Road, Suite 351
Mineola, New York 11501
Tel. 516-742-7600 • Fax 516-742-7618

Of Counsel
Catherine May Co, Esq.
Edward A. Fregosi, Jr., Esq.
Laura A. Mintz, Esq.
Khadija A. Misuraca, Esq.
Emily Shaw Record, Esq.
John J. Rivas, Esq.

August 18, 2017

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: Tina Braunstein v. Sahara Plaza, LLC, et al.
16-cv-8879 (VSB)

Dear Judge Broderick:

I am submitting this letter in response to your Order of June 30, 2017 directing a submission by August 18, 2017, detailing outstanding discovery issues.

I believe that documentary disclosure is complete. We were informed on July 25, 2017 that two of the noticed witnesses, Martin Mariano and Johan Widnersson were no longer employed and that the Director of Human Resources, Evan Hunt, was on unspecified leave and would not be available until late September. We were provided with last known addresses in New York for Mariano and Widnersson. We were subsequently informed that Mr. Widnersson presently resides in Sweden.

On August 7, 2017, we were informed that the Defendant would attempt to secure Mr. Mariano's cooperation to appear at Defendant Counsel's office. Mr. Mariano presently is employed by LOTTE at the New York Palace. While we agreed to Mr. Mariano's deposition at their office, we have not been informed of the result of Defendant's efforts.


Mr. Evan Hunt served as the ultimate repository of the records of Plaintiff's hiring, complaints against her, her complaints to management and her eventual termination. As such he is a critical witness.

Hon. Vernon S. Broderick
Re: Braunstein v. Sahara Plaza, LLC, et al.
August 18, 2017
Page 2

We are prepared to subpoena Mr. Mariano depending on Defendant's efforts and to await Mr. Hunt's return from whatever leave will expire in September.

We would ask the Court to order the Defendant depositions be completed by October 5, 2017, prior to the October 6, 2017 conference with the Court. I have consulted with Defendants' attorneys and they have authorized me to advise the Court that they do not object to this extension request.

Very truly yours,



E. Gordon Haesloop, Esq.

EGH/cm

cc: David I. Rosen, Esq.
Sills Cummis & Gross, PC
The Legal Center
One Riverfront Plaza
Newark, NJ 07102
drosen@sillscummis.com